

## The Parently Group (TPG)

### Modern Slavery & Human Trafficking Policy

#### 1. Purpose and Context

The Parently Group (“TPG”, “we”, “our”, “us”) is committed to ensuring that everyone involved in our supply chains works in conditions that are safe, fair, and dignified. Preventing modern slavery, forced labour, and human trafficking is a core component of our broader responsible sourcing and human rights commitments.

Although our turnover does not require publication of a Modern Slavery Statement under the UK Modern Slavery Act 2015, TPG chooses to adopt this Modern Slavery & Human Trafficking Policy voluntarily and proactively. This reflects our long-term commitment to ethical business, responsible sourcing, ETI membership, and continuous improvement.

This policy should be read alongside:

- TPG Responsible Sourcing Agreement (RSA)
- Supplier Code of Conduct
- ETI Base Code
- Sustainability / ESG policy
- Anti-Bribery & Corruption policy
- Whistleblowing (Speak Up) Policy
- Recruitment & HR policies

---

#### 2. Scope

This policy applies to:

- All TPG brands: David Luke, Grass & Air, and Juco
- All direct employees, workers, contractors, directors, agency workers, and temporary staff.
- All suppliers, factories, subcontractors, agents, logistics providers, and any other third parties involved in any part of TPG’s product lifecycle.
- All tiers of our supply chain where TPG products, components, trims, packaging or related services are produced.

Suppliers are expected to cascade the requirements of this policy to all subcontractors and upstream partners.

---

### 3. Definitions

- **Modern Slavery** means slavery, forced labour, bonded labour, debt bondage, involuntary prison labour, and human trafficking.
  - **Human Trafficking** involves the recruitment or movement of people for exploitation through coercion, deception or abuse of power.
  - **Child Labour** refers to work that is mentally, physically, socially, or morally dangerous, or interferes with schooling, in line with ILO standards.
  - **Employer Pays Principle:** *“No worker should pay for a job; the costs of recruitment should be borne by the employer.”*
- 

### 4. Reference Standards

TPG aligns its ethical and human rights expectations with:

- UK Modern Slavery Act 2015 (Section 54 – Transparency in Supply Chains)
- Ethical Trading Initiative (ETI) Base Code
- International Labour Organization (ILO) conventions
- UN Guiding Principles on Business and Human Rights (UNGPs)
- Sedex guidance and SMETA 4-pillar audit methodology

We expect all suppliers to work toward meeting these minimum standards - and, where possible, to exceed them.

---

### 5. Our Commitments

TPG commits to the following principles:

#### Zero Tolerance for Modern Slavery

- No forced, bonded, trafficked or involuntary labour.
- No worker can be required to lodge identity documents or deposits.

#### Employment Is Freely Chosen

- Workers must be free to leave with reasonable notice.
- The Employer Pays Principle must be upheld—workers must not pay recruitment fees.

#### No Child Labour

- No recruitment of anyone under the legal working age.
- Remediation plans must prioritise the welfare and education of any child found working.

## Fair Treatment, Respect, and Non-discrimination

- No harsh, inhumane, or degrading treatment.
- No discrimination in access to work, pay, benefits, training, or progression.

## Fair Wages and Working Hours

- Wages must meet legal or industry minimums (whichever is higher) and support basic needs.
- Overtime must be voluntary, paid at a premium, and not excessive.

## Safe and Hygienic Working Conditions

- Working environments must be safe, clean, and compliant with relevant local laws.
- Health and safety training must be provided and recorded.

## Responsible Subcontracting

- Production must only take place in TPG-approved facilities.
- Any subcontracting must receive written approval from TPG before production begins.

---

## 6. Governance and Responsibility

- **TPG Board of Directors** holds overall accountability.
- **CEO** ensures that modern slavery prevention is embedded into strategy and supply chain management.
- **Head of People** maintains oversight, reporting, training and implementation.
- **Managers** are responsible for compliance in their functional areas.
- **All employees, suppliers, and partners** must follow this policy and report concerns.

---

## 7. Risk Assessment and Human Rights Due Diligence

We take a risk-based approach to identifying and managing risks of modern slavery.

### Operational Risk Assessment

- Assessment of TPG's direct operations, including warehousing and logistics.

### Supply Chain Mapping

- Full traceability and transparency are required at every stage of production.
- Suppliers must notify TPG of changes to factories, processes, or subcontractors.

## Supplier Onboarding and Due Diligence

- Completion of TPG's Standard Factory Questionnaire (SFQ) and Sustainability & Environmental Questionnaire (SEQ).
- Acceptance of the RSA and ETI Base Code.
- Sedex registration, linked to TPG, with a fully completed SAQ.

## Monitoring and Audits

- Annual independent SMETA audits of first-tier factories.
- Only unannounced or semi-announced audits (minimum 3-week window) are accepted.
- Full audit reports (not summaries or CAPs alone) must be provided.

## High-Risk Scenarios

We require enhanced oversight where higher risks exist, including:

- High-risk geographies
- High-risk sectors (e.g., cut and sew, homeworking, embellishment units)
- Migrant labour and recruitment agency involvement
- Extensive subcontracting networks

---

## 8. Expectations of Suppliers and Business Partners

Suppliers must:

- Uphold all ETI Base Code requirements and ILO conventions.
- Ensure traceability and full supply chain transparency.
- Ensure all production is done in TPG-approved factories only.
- Have processes in place to prevent modern slavery and human trafficking.
- Monitor all subcontractors and maintain accurate documentation.
- Allow TPG and third-party auditors full, open access to sites and records.
- Share full audit reports, including follow-ups.
- Maintain an anti-bribery and corruption policy aligned with the UK Bribery Act 2010.
- Uphold the Employer Pays Principle and ethical recruitment standards.

Where gaps exist, suppliers must work with TPG to implement corrective actions.

---

## 9. Training and Capacity Building

TPG will:

- Provide modern slavery and ethical trade training to relevant teams (HR, Buying, Product, Sourcing, Supply Chain, ESG).
- Include modern slavery awareness in supplier-facing training.
- Maintain internal capability for identifying and escalating risk.
- Review training content regularly, reflecting changes in legislation and best practice.

Suppliers must ensure at least one staff member is responsible for managing ethical trade requirements and familiar with ETI, ILO, Modern Slavery Act, and local labour law.

---

## 10. Reporting Concerns (Speak Up / Whistleblowing)

TPG encourages all employees, workers, agents, suppliers, and stakeholders to report concerns relating to modern slavery or human rights abuses.

Concerns may be raised via:

- Line manager or HR
- TPG's whistleblowing/speak-up channels
- A dedicated ethics or compliance email address (to be inserted)

Reports can be confidential and, where local law permits, anonymous.

TPG commits to:

- Investigating all concerns seriously
  - Protecting individuals raising concerns in good faith from retaliation
  - Taking remedial action where issues are identified
- 

## 11. Remediation

If modern slavery or related abuses are identified:

- The safety and wellbeing of affected individuals will be prioritised.
- TPG will work with suppliers, local experts, or authorities to ensure remedy.
- Unpaid wages or unlawful recruitment fees must be reimbursed.
- Corrective action plans will be implemented and monitored.
- In serious or repeated cases, business relationships may be suspended or terminated.

---

## 12. Communication and Transparency

Although not legally required, TPG may:

- Publish a voluntary Modern Slavery Statement.
- Report progress within our ESG/sustainability communications.
- Engage openly with stakeholders on challenges and improvements.
- Share progress on Sedex and human rights due diligence programmes.

---

## 13. Review and Updates

This policy will be:

- Reviewed at least every **two years**, or earlier if legislation or risk changes.
- Approved by the **TPG Board** after each substantive update.
- Communicated to all employees, suppliers, and business partners.

---

## 14. Policy Approval

**Owner:** CEO

**Approved by:** Board of Directors

**Date Approved:** 14/06/2025

**Next Review Date:** 14/06/2026

---